

R E M A R K S

Cancel claims 8 and 10-16. Claims 1, 3-7 remain in the application.

Reconsideration of this application is respectfully requested.

Examiner contends that Shaughnessy shows Applicant's element of:

“selecting a set of target radios from amongst a plurality of subscriber radios by a dynamic group call originator, each one of the plurality of subscriber radios having a unique Internet Protocol (IP) address, the dynamic group call originator being a subscriber radio located in the radio communication system”

at column 3, lines 18-25 and column 5, lines 49-59. Applicant has read these section and finds that what is described by Shaughnessy is in fact predefined talk groups.

At column 3, lines 18-25, Shaughnessy refers to FIG. 2 and recites:

In FIG. 2, *four separate talk groups* are shown, identified by labels "A", "C", "D" and "G". *Talk group "A"* at least includes the subscriber units having reference numerals 214 and 215. *Talk group "C"* at least includes the subscriber unit having reference numeral 216. *Talk group "D"* at least includes the subscriber units having reference numerals 211-213. Finally, *talk group "G"* at least includes the subscriber units having reference numerals 210 and 217. [emphasis added]

Shaughnessy goes on to recite that each talk group has a unique IP address. Clearly Applicant and Examiner agree that Shaughnessy does not teach each individual radio having a unique IP address.

Examiner combined Shaughnessy with Swartz because Swartz shows radios with unique IP addresses. Swartz is concerned with wireless LAN devices. Swartz however does not teach

that any of the subscriber radios may form a talk group. In fact there is no suggestion in Swartz of talk group formation. Therefore Applicant contends there would be no motivation to combine Shaughnessy with Swartz.

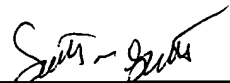
Furthermore, Applicant has amended claim 1 to include the limitation that the method includes querying a dispatch database to determine a current location area for each one of the plurality of subscriber radios in the set of target radios. Applicant contends this added limitation is not shown or suggested by either Shuaghnessy or Swartz, and claim 1 is therefore allowable over these references.

Please charge any fees due to **Deposit Account Number 502117**. The Deposit Account Name is **Motorola, Inc.**

Respectfully submitted,

SEND CORRESPONDENCE TO:

Motorola, Inc.
Customer Number 24273

By: 

Scott M. Garrett
Attorney of Record
Reg. No.: 39,988
Telephone: 954-723-6449
Fax No.: 954-723-5899